

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOB'S DAUGHTERS INTERNATIONAL,

Plaintiff,

v.

HEIDI YOAST,

Defendant.

HEIDI YOAST,

Counterclaim-Plaintiff,

v.

JOB'S DAUGHTERS INTERNATIONAL,
SHELLY COLE aka SHELLY HOWRIGON,
an individual, ROD REID, an individual,

Counterclaim-Defendants.

NO. 16-cv-1573-RSL

DECLARATION OF SUSAN GOOLSBY

Being duly sworn under her oath, Susan Goolsby states as follows:

1. My name is Susan Goolsby and I am the executive manager of Job's Daughters International, a position I have held for over 40 years. I am over the age of twenty-one (21) and under no legal disability.

2. I have personal knowledge of the facts set forth herein and if called to testify would state and allege the following.

AFFIDAVIT OF SUSAN GOOLSBY
(16-cv-1573-RSL)

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3. I attended the Job's Daughters International Supreme Session in July 2016 in Grand Rapids, Michigan. During that Session, I attended all town hall and business meetings of JDI. Specifically, I was present at two (2) town hall meetings and the business meeting when Shelly Cole discussed changes that JDI was making to its by-laws with respect to the use of JDI's trademarks.

4. At no time during any of the presentations did I hear Shelly Cole use the name Heidi Yoast (or a Past Grand Bethel Honor Queen from the State of Washington) nor did I ever hear her say that Heidi Yoast had been sent letters from JDI, that Heidi Yoast was using JDI trademarks without permission, or that any one should not buy product from Ms. Yoast. Furthermore, Ms. Cole did not ever pull up any social media account or website belonging to Heidi Yoast during any of her presentations.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

DATED this 2nd day of March at Omaha, Nebraska

Susan Goolsby

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CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2018, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following:

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DATED this 5th day of March, 2017.

s/ Rodney L. Umberger

s/ Daniel J. Velloth

Rodney L. Umberger, Jr., WSBA #24948

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